

Policy Issues For Consideration Regarding Once-Through Cooling

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Work Closely With New California Ocean Protection Council

- Council established to implement the California Ocean Protection Act of 2004 (SB 1319)
- Ocean protection and restoration is a major policy initiative for the Schwarzenegger Administration
- Represents an opportunity for the Energy Commission to coordinate with other agencies, environmental organizations and others to help address once-through cooling issues
- Council provides appropriate forum to develop statewide policies to address the concerns and impacts of once-through cooling
- Staff attended Council meetings in March and June, and was asked to make a presentation on once-through cooling at the June 10th meeting in San Francisco



Develop A New Policy For Siting Cases

- New policy could be similar to one adopted in 2003 for conservation of freshwater sources
- The new policy could state “The Energy Commission may approve once-through cooling by power plants it licenses, or for licenses it amends related to cooling system modifications, only where alternative water supply sources or alternative cooling technologies are shown to be both environmentally undesirable and economically unsound.” The Commission interprets “environmentally undesirable” to mean the same as having a significant adverse environmental impact” and “economically unsound” to mean “economically or otherwise infeasible.”



Create Financial Incentives to Promote The Use of Alternative Cooling

- Costs have kept project owners from readily utilizing alternatives to once-through cooling
- The impetus created by requiring power plants to implement Phase II cooling water intake structure improvements may not be an adequate financial incentive by itself to encourage replacement of once-through cooling with alternative cooling technologies
- The Energy Commission could explore ways to create financial incentives and promote the use of these incentives to encourage project owners to adopt alternatives to once-through cooling



Update the Energy Commission Data Adequacy Regulations

- The Energy Commission is in the process of updating the Biological Resources 12-month Data Adequacy Regulations to provide a much broader explanation of the types of studies and data that needs to be provided as part of a complete application to the Energy Commission for a power plant project proposing to use or is currently using once-through cooling.
- Updating these regulations would be consistent with the language found in the 2005 Memorandum-Of-Agreement between the Energy Commission and the Coastal Commission regarding the need for applicants to provide a discussion of the project's compliance with California Coastal Act section 30413(d) and the need for a current and site-specific analysis of entrainment impacts.



Require Current Impact Studies For Licensing Analyses

- The Energy Commission could adopt a policy requiring the filing of a current impacts study with an application for any power plant that proposes the use of once-through cooling.
- The Energy Commission may also want to consider adopting a standardized impact analyses protocol for power plant siting cases. Staff and consultants have begun to develop a standardized impact analyses protocol which may be available this fall



Obtain Current Impact Analyses For All California Coastal Power Plants

- Current impact analyses are lacking for approximately two-thirds of California's coastal power plants
- Focus could be on the nine power plants in Santa Monica Bay region
- The Energy Commission could work with other concerned agencies through the California Ocean Protection Council to develop and fund site specific impact studies
- Study could also identify local alternative cooling water sources such as reclaimed water supplies from wastewater treatment facilities
- Studies could be coordinated by the PIER program through Moss Landing Marine Laboratories to help generate sufficient information to complete a sound cumulative impacts analysis



Create Standardized Approaches To Regulations and Policies With Interested Stakeholders

- The Energy Commission could update the current Memoranda-of-Understanding/Agreement with the State Water Quality Control Board, Regional Water Quality Control Boards, and the California Coastal Commission to develop a consistent regulatory approach to once-through cooling power plants and Best Available Retrofit Technology to help minimize impacts
- A standardized approach would create a clearer approach to administering the regulations and policies that relate to once-through cooling
- Other state and federal agencies may also want to participate

